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JUN 5 1998

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Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of  
Proposal for Creation of the Low Power FM  
(LPFM) Broadcast Service  
FCC RM-9242

DOCKET FILE COPY ORIGINAL

To: Federal Communications Commission

Reply-Comments of Joseph Cotton

I write this letter as the representative of Baltimore Jewish Radio, Incorporated, a group of Orthodox Jewish people in Baltimore, interested in providing radio programming for our community. We are 'non-profit'.

Please approve proposal RM-9242. This is the Skinner proposal is for licensing of Low Powered FM broadcasting. Please also consider allowing use of the 'new' A.M. frequencies of 1620 kHz to 1710 kHz for community broadcasting.

I am a member of an ethnic group, and very many of our group (about 15,000 people) live within a radius of about five kilometers. I have tried to get a "show" on a commercial station, but the cost is \$200-\$400 per hour, which is prohibitive. I would like to broadcast our ethnic music (24 hours per day), classes in our language and culture, and children's shows on weekends and early evenings. (Most of what is currently broadcast by commercial stations is not of our ethnic group's culture, or not suitable for our children, or just not of interest to people in our group) Our broadcasting needs would be served with a low powered FM transmitter, say 10 watts, to cover our neighborhood.

Please DO NOT approve licenses for people who have been guilty of broadcasting illegally. We are very law abiding, and feel that it would put us at a disadvantage, if those who trample the law can gain special advantage by doing that. We refrain from illegal activities such as 'pirate' broadcasting. We will always work within the law, at all times. We wish that everyone else would, also. We are happy that the possibility exists where we will be able to operate a low power broadcast radio station legally. Please make this a reality for us.

I have studied the rules for station frequency allocations, and I think that I understand them. I have located five possible frequencies for a low powered station, which will not interfere with existing stations here in Baltimore. I used the FCC list of stations, available on the internet at the FCC web site.

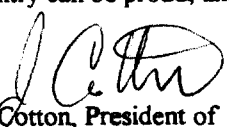
There have been 460 full-power FM stations (grandfathered short-spaced stations) operating on 2nd and 3rd adjacent channels for many years, nationwide, with no interference complaints. If these more powerful full-power FM stations don't cause interference using the 2nd and 3rd adjacent channels, then LPFM stations certainly will not cause interference either.

Localism must be put back into broadcasting, something lost when big corporations with distant owners buy up hundreds of stations, as now being done. In a recent Washington Post article, I found out that ALL of the commercial radio stations in the Washington D.C. area are owned by just five companies. There are no more stations owned by companies which that station is their only station!

Under the Skinner plan an applicant must live within 50-miles of the proposed antenna site and not own any other "primary service" stations. This is to keep the large companies from usurping these channels. Please keep these new channels for those of limited financial means. Without adequate safeguards, it is feared these channels will go to the highest bidder at FCC auctions, thereby depriving those of limited financial means a voice on the airwaves. Deletion of the 2nd and 3rd adjacent channel restrictions, as proposed, will make channels available in nearly every city across America, freeing up many channels for use in large markets where none are available now due to unnecessary 2nd and 3rd adjacent channel restrictions. Vast improvements in receiver designs have been implemented since the rules were created decades ago, making it possible to do away with 2nd and 3rd adjacent channel restrictions. Again, please also consider allowing use of the 'new' A.M. frequencies of 1620 kHz to 1710 kHz for community broadcasting.

We, the Baltimore Jewish Radio, Incorporated, are a group who are interested in providing good quality radio programming for our particular ethnic group. We are not 'hobby' broadcasters; there are people with professional experience in our organization. We intend to provide programming of which we, our community, and our country can be proud, and serve our community well.

Signed:

  
Joseph Cotton, President of Baltimore Jewish Radio, Inc.  
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CERTIFICATE OF SERVICE

I, Joseph Cotton, do hereby certify that a true and correct copy of the foregoing "Reply-Comments on RM-9242" was sent via first class mail, this third day of June, 1998, to the following parties:

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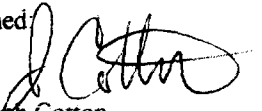
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